

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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UNITED STATES OF AMERICA,)
)
 vs.)
)
 RAYMOND ASSELIN, SR., et al.)
)
 Defendants.)

CRIM. NO. 04-30033-MAP

U.S. DISTRICT COURT
DISTRICT OF MASS.

INITIAL JOINT MEMORANDUM PURSUANT TO LOCAL RULE 116.5(A)

The United States of America, by and through Michael J. Sullivan, United States Attorney for the District of Massachusetts, and William M. Welch II, Assistant United States Attorney, hereby files this initial joint memorandum pursuant to Local Rule 116.5(A) and the Magistrate Judge's Scheduling Order as follows:

1. The parties agree that relief should be granted from the otherwise applicable timing requirements imposed by Local Rule 116.3. This case has been designated a complex case.

2. Defendants Christopher Asselin, Maria Serrazina and Peter Davis have requested discovery under FRCP 16(a)(1)(G); no other defendants have requested such discovery. The Government hereby makes a request for reciprocal discovery under FRCP 16(b)(1)(C), and defendants Christopher Asselin, Maria Serrazina and Peter Davis agree to provide reciprocal discovery under FRCP 16(b)(1)(C) by this agreement.

3. At this time, the defendants have not completed their review of all of the automatic discovery. Therefore, the parties believe that it is premature to state whether or not they expect to provide any additional discovery in the future.

4. The parties agree that a motion date should not be set under FRCP 12(c) at this time. Until discovery has been reviewed, the parties are not in a position to set any motion dates. The parties anticipate filing motions.

5. Given this case's designation as a complex case, no time will have run on the Speedy Trial Clock as of March 22nd, 2005, the date of the status conference.

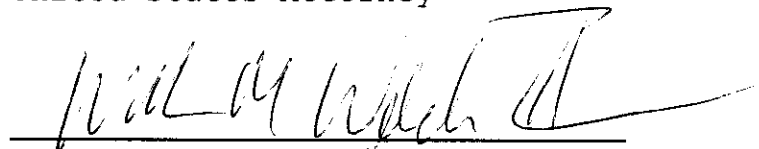
6. The parties believe at this point that a trial should be anticipated. At this time, the Government would estimate a trial of two months.

7. A second Interim Status Conference should be set for early June, 2005.

Filed this 17th day of March, 2005.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney



WILLIAM M. WELCH II
Assistant United States Attorney

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For defendant Peter Davis:

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For defendant John Spano:

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For defendant James Asselin:

ROY ANDERSON, ESQ.

For defendant Maria Serrazina

THOMAS LESSER, ESQ.

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For defendant Merylina Asselin:

DAVID HOOSE, ESQ.

For defendant Raymond Asselin, Jr.

JOSEPH BALLERO, ESQ.
Counsel for defendant Asselin

CERTIFICATE OF SERVICE

Hampden, ss.

Springfield, Massachusetts
March 18, 2005

I, William M. Welch, Assistant U.S. Attorney, do hereby certify that I have served a copy of the foregoing by faxing said motion to:

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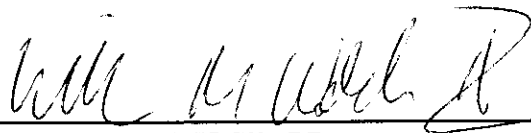
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